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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In re:

RANCHO DESTINO INV LLC

Debtor(s)

CASE NO.: 21-10057-ABL  
TRUSTEE:

CHAPTER: 11

HEARING DATE: APRIL 21, 2021  
HEARING TIME: 1:30 PM

**MOTION TO ALLOW DEBTOR TO SELL REAL PROPERTY LOCATED**  
**At 8835 Rancho Destino Road, Las Vegas, NV 89123**

RANCHO DESTINO INV LLC (hereinafter referred to as “Debtor(s)”), by and through their attorney, Seth D. Ballstaedt, Esq., hereby respectfully request this Court to grant an Order Approving the Sale of said property. The Subject Property of this motion is commonly known or identified as **8835 Rancho Destino Rd, Las Vegas, NV 89123** (“subject property”).

Subject Property is the only asset of Debtor, and upon the sale of the property, the mortgage lien, taxes, and fees will be paid in full. With the sale of Debtor’s only asset, Debtor will no longer remain in operation.

1. Debtor(s) commenced this case on January 7, 2021 by filing a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.

2. On the date of filing, debtor(s) owned real property, listed on Schedule A, and commonly known as **8835 Rancho Destino Rd, Las Vegas, NV 89123** (hereinafter referred to as “subject property”).

3. Debtor has received an offer for purchase of said property for \$575,000.00 for which all liens, taxes, as well as fees related to the sale of the home shall be paid in full. Debtor’s agent has provided a proposed settlement statement (Exhibit A), however the lien holder Security National Mortgage Company has not yet responded with an exact payoff amount, as of the date of this motion. Debtor anticipates that the payoff to Security National Mortgage Company will not exceed \$345,000.00.

4. It is anticipated that Debtor will receive net proceeds of approximately \$188,717.34.

5. The remaining debts of Debtor will be paid in full from the proceeds of the sale, including any remaining fees or costs in this bankruptcy case.

6. Debtor now seeks courts approval to proceed with the sale.

WHEREFORE, Debtor(s) pray that this honorable court:

1. Grant the Debtor’s Motion for Approval to Sell Real Property

2. Any further just and equitable relief this Court deems proper under the circumstances.

Dated this 22 day of March, 2021

/s/ Seth D. Ballstaedt, Esq.  
Seth D. Ballstaedt, Esq.  
*Attorney for Debtor(s)*